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April 2, 2023

Via ECF

Hon. Hector Gonzalez
U.S. District Court Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Cruz v. Moleskine America, Inc., Case No. 1:23-CV-1516 (HG)
Letter Motion to Extend Time to Answer and to File Joint Submission

Dear Judge Gonzalez:

We represent Defendant Moleskine America, Inc. ("Moleskine") in the above-captioned action.

We write with the concurrence of Plaintiff's counsel to request a 60-day extension of the time by which Moleskine must answer, move or otherwise respond to the Complaint from April 7, 2023 to June 6, 2023, and to adjourn the parties' deadline to file a joint case management plan presently scheduled for April 21, 2023 for approximately 60 days. Plaintiff consents to Moleskine's request for an extension of time to respond to the Complaint and joins in the request for adjournment of the case management filing deadline.

This is the first request for an adjournment and the additional time is needed to allow Defendant to confer with its insurer and will allow the parties to consider settlement possibilities.

Respectfully submitted,

David G. Glasser

cc: Mars Khaimov, Esq.
Mars Khaimov Law, PLLC
Counsel for Plaintiff